



910 W. Basin Road, New Castle DE 19720  
HOME OFFICE: COLUMBUS, OHIO

January 12, 2005

Republic Western Insurance  
P.O. Box 2789  
Warminster, PA 18974-2789  
Attn: Karen Burczewski

**OUR INSURED :** Sara S Echevarria  
**OUR CLAIM NUMBER :** 89 07 497126 05152004 01  
**DATE OF ACCIDENT :** 05-15-2004  
**CLAIMANT NAME :** Sara S Echevarria

Dear Ms. Burczewski ,

I appreciate your call regarding the above matter, however, I still request the location of the trailer unit so it may be inspected. If the unit has been disposed of, please confirm this in writing.

You will need to support your contention that the trailer unit was indeed in proper working order and maintained. Irrespective of the information suggesting that the vehicle renter, Roger Mayfield re-hitched the unit, it is notable that he traveled over three hundred miles before the coupling detached. The information we have is that Mayfield had re-attached the hitch in North Carolina, however, this accident occurred in Delaware, which is a rather long distance away from the point of coupling. This suggests that they may have been something more than just a matter of an improper hitching.

Notwithstanding, Mayfield was a renter, and proper instructions should be afforded these persons upon the rental of such units to protect such foreseeable events from occurring. This is a duty of both the leasing agent and the manufacturer. Without the identity of the manufacturer, we are unable to determine if there was appropriate instructions provided for the use and maintenance of the unit. The design of the unit may also be in question as to its useability, and whether or not its design is conducive to its proper use.

If you have the name of the manufacturer of the hitching mechanism, I would appreciate your favoring me with this information so I may research whether any recalls on this mechanism were issued by that manufacturer, NHTSA or other consumer organization.

Please let me hear from you by February 1, 2005 in this regard.

NATIONWIDE GENERAL INSURANCE COMPANY

Sonja Blackhawk  
Claims Department  
(302)325-8932

©: Richard DiLiberto, Esq.  
1000 West Street  
The Brandywine Building  
Wilmington DE 19899

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August 27, 2004

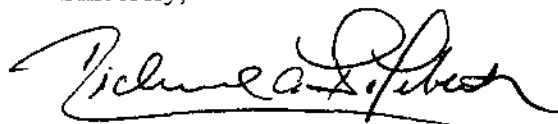
Ms. Karen A. Burczewski  
Republic Western Insurance Company  
P.O. Box 2789  
Warminster, PA 18974-2789

Re: My Client: Sara Echevarria  
Your Insured: U-Haul  
Date of Loss: 5/15/04  
Claim No.: 02393161

Dear Ms. Burczewski:

May I please have a response to my letters to you dated July 26, 2004 and August 12, 2004, copies of which are enclosed for your ease of reference. Thank you.

Sincerely,

  
Richard A. DiLiberto, Jr.

RAD:ncp  
Enclosures

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August 12, 2004


Ms. Karen A. Burczewski  
Republic Western Insurance Company  
P.O. Box 2789  
Warminster, PA 18974-2789

Re: My Client: Sara Echevarria  
Your Insured: U-Haul  
Date of Loss: 5/15/04  
Claim No.: 02393161

Dear Ms. Burczewski:

May I please have a response to my letter to you dated July 26, 2004, a copy of which is enclosed for your ease of reference. Thank you.

Sincerely,

  
Richard A. DiLiberto, Jr.

RAD:ncp  
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July 26, 2004

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Re: My Client: Sara Echevarria  
Your Insured: U-Haul  
Date of Loss: 5/15/04  
Claim No.: 02393161

Dear Ms. Burczewski:

This will confirm your telephone call to my office during you informed me that you have interviewed Mr. Mayfield and have disclaimed coverage to my client on this matter because Mr. Mayfield informed you that he disconnected the chains to the U-Haul trailer and re-attached them himself.

Please send me a copy of the transcript of your statement with Mr. Mayfield. Also, please send me a copy of the policy at issue and reference the portions of the policy which permit you to disclaim coverage in this situation.

Additionally, kindly inform me of Mr. Mayfield's liability insurance on any vehicles he owned which are applicable in this situation.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Ms. Karen A. Burczewski

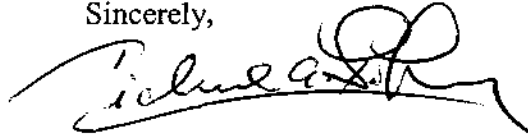
July 26, 2004

Page 2

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Does U-Haul ask for proof of insurance prior to renting an individual a trailer? I look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. DiLiberto, Jr.", with a stylized flourish at the end.

Richard A. DiLiberto, Jr.

RAD:ncp

cc: Ms. Sara Echevarria